

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

Mail Processing Network :  
Rationalization Service : Docket No. N2012-1  
Changes, 2012 :

GREETING CARD ASSOCIATION NOTICE  
OF INTENT TO CONDUCT ORAL CROSS EXAMINATION

Pursuant to Rule 30(e)(3) of the Rules of Practice and Presiding Officer's Ruling No. 5, the Greeting Card Association (GCA) herewith gives notice of intent to cross examine certain Postal Service witnesses in this proceeding. GCA anticipates oral cross examination of –

Witness Williams (USPS-T-1). Light cross examination; subject matters including process of deciding new service standards for overnight mail in First-Class Mail (USPS-T-1, all).

Witness Rosenberg (USPS-T-3). Light to moderate cross examination; subject matters including network optimization study, with possible focus on iterations run with the scoring tool, optimal mail processing locations for the new network, impact of DBCS 7 equipment on witness's conclusions, feasible and infeasible networks (USPS-T-3, all; possible focus on pp. 1-8, 21, 25-26, 33-37).

Witness Neri (USPS-T-4). Light cross examination; subject matters including excess capacity in mail processing equipment, DBCS 6 productivity compared to DBCS 7, service changes and the value of letter mail (USPS-T-4, pp. 5-7, 10-22, 27-29).

Witness Smith (USPS-T-9). Light cross examination; subject matters including DBCS 7 productivity and witness' calculations based on DBCS 6, moving manual

operations mail into automated operations, timing of purchases of DBCS or upgrades from older machinery (USPS-T-9, all).

Witness Bradley (USPS-T-10). Light cross examination; subject matters including assumptions and types of analysis conducted (USPS-T-10, all).

In each case, cross examination will include the witness's responses to GCA interrogatories, and any interrogatories of other parties, which GCA will have designated.

March 12, 2012

Respectfully submitted,

**GREETING CARD ASSOCIATION**

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